

CMR

United States Court for the
Eastern District of Pennsylvania

Mr. Coston L. Pratt

VS.

UNIVERSITY OF Pennsylvania
and UNIVERSITY OF Pennsylvania Police.
office of the General Counsel
133 South 36th St, suite 300
Philadelphia, PA. 19104-3246

16 5011

Complaint for civil action

I Coston L. Pratt, on this day of Aug 9 / 16th / 2016, is filing a
civil action against the : UNIVERSITY OF Pennsylvania and

university of Pennsylvania Police.

For violation(s) of Plaintiff U.S. Constitutional
amend iv rights.

The university of Pennsylvania search without a
warrant to search my House on 3/3/2016

is not reasonable simply because the officers didn't
have probable cause. To believe that (cheek)

incriminating evidence will be disclosed within
my House 5209 Chestnut St Phila. PA. if this constituted

exigent circumstances, it would be almost impossible to
to think of a case in which a warrant would be necessary

An House is per se protected by the searchwarrant procedure
of U.S. Const. amend. iv.

VIOLATIONS OF THE 4th Amendment

Probable cause to believe that a person has committed a crime on the street does not necessarily give rise to Probable cause to search his House.

on 12/2015, I Costen Pratt deposit a check for Friend into T.D. Bank N.A. ATM at 37th Walnut St. Phila. PA.

on 3/3/2016 at 6am my (2) front doors was Busted in and My Bedroom door Busted in with 3 undercover Agents from University of Pennsylvania Police. I was grazed on my Back on 1st floor. Hitting my head and Back, grazed down hallway down steps.

Placed in Broken chair while my 8 room house was being "SEARCHED" for about 2 hours. I was informed that (SEARCHED) was for illegal Guns and drugs. There was no Guns, drugs and or checks in my house. So not only did

University of Pennsylvania Police violated my U.S. Constitutional 4th Amendment rights. By Searching my house without Search warrant, they violated my Legal rights.

Respectfully,

CMR

United States Court for the
Eastern District of Pennsylvania

Mr. Coston L. Pratt

v.

University of Pennsylvania

and

University of Pennsylvania Police

Civil Action No. 16 5011

VERIFICATION

I, Coston L. Pratt hereby certify that the statements made in the foregoing Motion are true and correct to the best of my understanding, information, knowledge, and belief. I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. Section 4904 relating to Unsworn Falsification to Authorities.

DATE

9/16/16

SIGN

Coston L. Pratt

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Philadelphia

CIVIL COMPLAINT

| |
|------------------------------|
| Magisterial District Number: |
| District Justice Name: Hon. |
| Address: |
| Telephone: () |

PLAINTIFF:

NAME and ADDRESS

MR. Coston L. Pratt CCC-
~~2815 North 17th~~ 2815 North 17th
 Phila PA ~~19132~~ 19132
 VS.

DEFENDANT:

NAME and ADDRESS

University of Pennsylvania
 University of Penn
 133 South 2nd St. Suite 300
 Phila. PA. 19104

Court No.:

Date Filed:



| | AMOUNT | DATE PAID |
|---------------|--------|-----------|
| FILING COSTS | \$ | |
| POSTAGE | \$ | |
| SERVICE COSTS | \$ | |
| CONSTABLE ED | \$ | |
| TOTAL | \$ | |

\$4950,000.00

TO THE DEFENDANT: The above named plaintiff(s) take judgment against you for \$ ~~4950,000.00~~ together with costs upon the following claim(s) (Civil fine must include citation of the statute or ordinance violated):

1. illegal non-search warrant
2. mental suffering
3. Physical suffering
4. Financial suffering
5. Increase in Health Problems.

I, Coston L. Pratt swear, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief. This statement is made subject to the penalties of Section 4904 of the Crimes Code (18 P.S. § 4904) related to unsworn false statement in authorized fee.

Plaintiff's

Attorney:

Telephone:

Address:

Coston L. Pratt
 CCC & Community Center
 60244 12815 N. 17th
 Phila. PA. ~~19132~~ 19132

IF YOU INTEND TO ENTER A DEFENSE TO THIS COMPLAINT, YOU SHOULD SO NOTIFY THIS OFFICE IMMEDIATELY AT THE ABOVE TELEPHONE NUMBER. YOU MUST APPEAR AT THE HEARING AND PRESENT YOUR DEFENSE. UNLESS YOU DO, JUDGMENT MAY BE ENTERED AGAINST YOU BY DEFAULT.

If you have a claim against the plaintiff which is within district justice jurisdiction and which you intend to assert at the hearing, you must file it on a complaint form at this office at least five (5) days before the date set for the hearing.

If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation.

AOPC 329A-03

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

MR. COSTON L. PRATT
~~ROBERT L. PRATT~~
Philadelphia, PA. 19130
(In the space above enter the full name(s) of the plaintiff(s).)

- against -

University of Pennsylvania
And
University of Pennsylvania
Police
Office of the Gen. Counsel
133 South 36th St. Suite-300
Philadelphia, PA. 19104-3246

16 5011

COMPLAINT

under the
Civil Rights Act, 42 U.S.C. § 1983
(Prisoner Complaint)

Jury Trial: ☐ Yes ☐ No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, you may write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name Coston Pratt
ID # 602447
Current Institution Philadelphia Detention Center CCL
Address 2815 N. 17th Street
Philadelphia PA. 19132

- B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name University of Penn Police officer Shield # N/A
Where Currently Employed University of Pennsylvania
Address 133 South 36th Street, Suite 300
Philadelphia, PA 19104

Defendant No. 2 Name University of Penn Police officer Shield # N/A
Where Currently Employed University of Pennsylvania
Address 133 South 36th St., Suite 300
Philadelphia, PA 19104

Defendant No. 3 Name University of Penn Police officer Shield # N/A
Where Currently Employed University of Pennsylvania
Address 133 South 36th St., Suite 300
Philadelphia, PA 19104

Defendant No. 4 Name University of Penn Police officer Shield # N/A
Where Currently Employed University of Pennsylvania
Address 133 South 36th St., Suite 300
Philadelphia, PA 19104

Defendant No. 5 Name University of Penn Police officer Shield # N/A
Where Currently Employed University of Pennsylvania
Address 133 South 36th St., Suite 300
Philadelphia, PA 19104

II. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur? N/A

B. Where in the institution did the events giving rise to your claim(s) occur? N/A

C. What date and approximate time did the events giving rise to your claim(s) occur? 3/3/2016 6:30 A.M.

violations of Plaintiff's

vis. Constitutional amend IV rights

D. Facts:

The university of Pennsylvania Police Search without a search warrant of my house on 3/3/2016 at 6:30 AM EST. The university of Pennsylvania Police didn't have Probable Cause to believe that, illegal Guns, illegal drugs and ore illegal checks/credit cards incriminating evidence will/would be disclosed within my house 509 Chestnut St. At 6:15/6:30 AM the university of Pennsylvania Busted and kicked my front (2) doors my Bedroom door Busted in By university of Pennsylvania under cover Police agents I was grooved out my head on to floor hitting my head and back grooved down hallway down (30) steps. Placed in Broken chair while my 8 room house and Basement was being searched, for about 1 hour, I was informed that the (SEARCH) was for illegal Guns and drugs. Not only did university of Pennsylvania Police violated my vis. Constitutional 4th Amendment rights By Searching my house without search warrant.

III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. went to I was grooved out head, my

Head and Back.

Plaintiff has Medical Complications and/or Related
Psychiatric Problems. Chronic Back Pain

IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a

This didn't happen

prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes ☐ No ☒

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes ☐ No ☒ Do Not Know ☐

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes ☐ No ☒ Do Not Know ☐

If YES, which claim(s)? _____

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes ☐ No ☒

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes ☐ No ☒

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

1. Which claim(s) in this complaint did you grieve? _____

2. What was the result, if any? _____

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process. _____

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here: _____

2. If you did not file a grievance but informed any officials of your claim, state who you informed, when and how, and their response, if any: _____

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. _____

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. **Relief:**

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). \$4,000,000.00

Yes _____ No ✓

i. Parties to the previous lawsuit:

Defendants University of Pennsylvania

3. Docket or Index number _____

4. Name of Judge assigned to your case N/A
5. Approximate date of filing lawsuit 10/8/2016 9/9/2016
6. Is the case still pending? Yes ___ No ___
If NO, give the approximate date of disposition _____
7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) N/A



C. Have you filed other lawsuits in state or federal court?

Yes ___ No ☒

D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes ___ No ___

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 7th day of Aug 9, 2016.

Signature of Plaintiff

[Handwritten Signature]

Inmate Number

602447

Institution Address

~~Prison~~ ~~CC~~ CCE
~~Prison~~ 2815 N. 17th St
Philadelphia, PA 19132

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this Fri day of Aug 9, 2016, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff:

Caster Pruitt

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

COSTON PRATT

:

V.

: CIVIL ACTION NO. _____

UNIVERSITY OF PENNSYLVANIA

AND

:

UNIVERSITY OF PENNSYLVANIA

POLICE

Office of the General Counsel

133 south 36th st, suite-300

Philadelphia, PA.19104-3246

PLAINTIFF RELIEF

- 1) Plaintiff seeks a preliminary and permanent injunction that would in the future prevent the defendant's malevolent conduct that caused initial **VIOLATIONS of the Plaintiff CONSTITUTIONAL RIGHTS**

(U.S. Const amend. IV)

Whatever the mechanism that was employed by the alleged actors **University of Pennsylvania Police** for which id employed by **University of Pennsylvania**

Plaintiff is asking that it be mooted, modified and/or omitted in order to ensure that future infringements into petitioners **U.S. Const amend IV rights** and the protected rights of other Plaintiffs in Philadelphia and On **University of Pennsylvania** grounds are prevented

2) Plaintiff seeks nominal damages for the **Violation(s) Of his Constitutional rights** in the amount of:
\$90.000.00

3) Plaintiff seeks Compensatory damages for the on going, staggering **Psychiatric, emotional distress, Grave Mental conditions.**

Chronic effects from untreated Alcohol/Drugs on the Brain and Spiritual anguish from not being able to make daily N.A./A.A. meetings.

The Complications to his Physical health:

(High Blood pressure, Hep-C Liver damages and untreated by Plaintiff **GASTROENTEROLOGY** on 5/13/2016 by Dr. Mervya D. Danileaitz, M.D., A.G.A.F. Massive weight gain, P.T.S.D. from 3/3/2016 by **university of Pennsylvania Police illegal-force** into plaintiff house and **illegal-Search.**

This is total Violation(s) of his CONSTITUTIONAL RIGHTS that he has suffered in the amount of.

\$2,720.300.00

4) Plaintiff seeks punitive damages Collectives for the malicious conduct of the University of Pennsylvania Police; Which deprived petitioner of his liberty opportunities to pursue happiness and the restoration of his family life and opportunity to be with his sister Robin B.Best in her struggle with cancer that took her life on July 4th, 2016, and also plaintiff lost his relationship with his girlfriend of 4 years because of his imprisonment. The Plaintiff has also lost his contacts with his children and grand-Children.

**Plaintiff seeks Compensation in the amount of
\$1,240.000.00**